

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI LP, OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPKO LLC, OPENAI GLOBAL
LLC, OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC,

Defendants.

Case No. 1:23-cv-11195-SHS-OTW

**[PROPOSED] ORDER
GRANTING MOTION TO
ADMIT COUNSEL
PRO HAC VICE**

The motion of Elana Nightingale Dawson for admission to practice *pro hac vice* in the above captioned action is granted.

Applicant has declared that she is a member in good standing of the Bars of the State of Illinois and the District of Columbia and that her contact information is as follows:

Applicant's Name: Elana Nightingale Dawson

Firm Name: Latham & Watkins LLP

Address: 555 Eleventh Street, NW, Suite 1000

City/State/Zip: Washington, D.C. 20004

Telephone: (202) 637-2200 / Facsimile: (202) 637-2201

Applicant having requested admission *pro hac vice* to appear for all purposes as counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, OpenAI Holdings, LLC (together, "OpenAI").

IT IS HEREBY ORDERED that Applicant is admitted to practice *pro hac vice* in the

above-captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: _____, 2024

United States District Judge Sidney H. Stein